

Report on Compliance with Court-Ordered Requirements

SNAP/APA

STATE OF ALASKA, DEPARTMENT OF HEALTH, NOVEMBER 1,
2025

Table of Contents

I.	Introduction.....	2
II.	Federal Guidance and Correspondence	3
III.	Timely Processing of Applications	7
A.	Workload and Timeliness.....	7
B.	IT Modernization	8
C.	Staffing Improvements.....	9
D.	Non-Merit Contract Staff.....	10
E.	Training and Development.....	11
IV.	Efforts to Streamline Administration of Programs	13
V.	Conclusion	15
VI.	1a.Attachment 1.a	16
	b. Attachment 1.b.....	18
	c. Attachment 1.c	20
	d. Attachment 1.d.....	24
	e. Attachment 1.e	27
	f. Attachment 1.f.....	29
	g. Attachment 1.g.....	36
	h. Attachment 1.h.....	47
	i. Attachment 1.i.....	49
	j. Attachment 1.j.....	53
	k. Attachment 1.k.....	55
	l. Attachment 1.l.....	58
	m. Attachment 1.m.....	61
	n. Attachment 1.n	62
VII.	Attachment 2	65
VIII.	Attachment 3	71
IX.	Attachment 4	76
X.	Attachment 5	88
XI.	Attachment 6	91
XII.	Attachment 7	92

I. Introduction

The Division of Public Assistance submits this report to provide the Court with an update on efforts to sustain operations, uphold service delivery, and support Alaskans during the ongoing federal government shutdown. The shutdown has paused federal funding for the Supplemental Nutrition Assistance Program (SNAP), and as a result, November benefits will not be issued at the time of drafting this court report.

The Division recognizes the uncertainty this situation creates for Alaskans who depend on SNAP and continues to monitor developments closely in coordination with FNS and the Department of Health. Although benefits cannot be distributed during the shutdown, the Division continues to administer all SNAP eligibility operations, including processing applications, conducting interviews, and maintaining system readiness. This ensures that benefits can be issued immediately once federal funding is reinstated. On October 10, the U.S. Department of Agriculture, Food and Nutrition Service (FNS) instructed states to pause November benefit issuances to prevent loading benefits onto Electronic Benefit Transfer (EBT) cards until federal funding is restored. FNS will notify states when the suspension is lifted, at which point November and subsequent benefits will be issued to eligible households. This nationwide directive ensures that household benefits issued before November remain available on EBT cards and can continue to be used by clients during the lapse in federal funding.

Despite these external challenges, the Division continued advancing key initiatives to strengthen accuracy, timeliness, and overall service delivery. The Food and

Nutrition Service formally approved Alaska's Quality Control Investment Plan, which provides a framework for targeted improvements to eligibility accuracy and oversight. The Division also continued progress on modernization projects, workforce development, and staff training to build long-term capacity across all public assistance programs.

Additionally, the Division supported Alaska's emergency response following the October storms that affected multiple western communities, ensuring timely access to replacement benefits and coordination with community partners during recovery.

Through these combined efforts, the Division remains committed to providing consistent, compassionate, and efficient public assistance, maintaining readiness to restore full-benefit operations the moment federal appropriations resume.

II. Federal Guidance and Correspondence

Federal guidance in October was dominated by the lapse in federal appropriations and related contingency planning for the Supplemental Nutrition Assistance Program (SNAP). On October 1, 2025, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) issued a national memorandum announcing the orderly shutdown of nonessential operations while confirming that states should continue normal program administration through the end of the month (**Attachment 1.a**).

Alaska received additional regional instructions on October 10 (**Attachment 1.b**), and October 24 (**Attachment 1.c**) directing states to hold November issuance files and suspend all automated SNAP issuances pending congressional action. The Division of Public Assistance (DPA) immediately complied, suppressing both monthly and daily issuance files in Alaska's Resource for Integrated Eligibility Services (ARIES) system to

prevent November benefits from being transmitted to the Electronic Benefit Transfer (EBT) processor.

FNS later clarified that states could continue issuing benefits through October 31, 2025, but must withhold November issuances until further notice. When six expedited households received early November benefits, the Division self-reported the inadvertent issuances to FNS, reversed them, and implemented system and procedural safeguards to prevent recurrence (**Attachment 1.d**).

To address public concern stemming from national rumors that retailers might be deauthorized to allow transactions for funds already loaded on recipient cards during the shutdown, FNS confirmed directly to Alaska that there was **no** such communication or intent to block card use. Retailers were instructed to continue processing valid transactions for existing balances (**Attachment 1.e**).

On September 30, 2025, FNS approved Alaska's Federal Fiscal Year 2026 SNAP State Plan of Operations, including the Employment and Training (E&T) Plan, SNAP Outreach Plan, Management Evaluation (ME) Plan, and administrative budget (**Attachment 1.f**). The approval reflected strong collaboration between the Division and the FNS Western Regional Office (WRO) and was effective October 1, 2025, pending appropriations.

In early October, FNS issued a national implementation memorandum for the One Big Beautiful Bill Act of 2025 (OBBB), which amended Able-Bodied Adults Without Dependents (ABAWD) provisions (**Attachment 1.g**). The memorandum expanded the age range subject to time limits to 64, restricted exemptions for parents to those caring for children under 14, removed prior exceptions for veterans, homeless individuals, and foster youth, and created new exemptions for Alaska Natives, American Indians, and

Urban Indians. A companion memorandum revised waiver criteria to require areas to show unemployment rates exceeding 10 percent, with special provisions allowing Alaska and Hawaii to qualify at 150 percent above the national rate.

Following these changes, the Division requested guidance on renewal of Alaska's ABAWD and reinstatement waivers while federal operations were limited during the shutdown (**Attachment 1.h**). FNS acknowledged receipt and confirmed that leadership would review the requests once normal operations resumed. On October 23, 2025, FNS formally approved Alaska's ABAWD waiver, effective November 1, 2025, through October 31, 2026 (**Attachment 1.i**). The approval covers 20 boroughs and census areas where unemployment rates exceeded 150 percent of the national average, consistent with the new OBBB criteria.

Also in October, FNS worked closely with the Division to address the West Coast storm that significantly affected Western Alaska communities. Following coordination calls with FNS, the Division submitted and received approval for a waiver extending the timeframe for affected households to report food loss and request replacement SNAP benefits (**Attachment 1.j**). The waiver authorized a 30-day reporting period, replacing the standard 10-day requirement, and covered approximately 2,273 SNAP households across five boroughs and regional attendance areas (**Attachments 1.k and 1.l**).

Also in October, FNS worked closely with the Division to address the West Coast storm that significantly affected Western Alaska communities. Following coordination calls with FNS, the Division submitted and received approval for a waiver extending the timeframe for affected households to report food loss and request replacement SNAP benefits (**Attachment 1.j**). The waiver authorized a 30-day reporting period, replacing the standard 10-day requirement, and covered approximately 2,273 SNAP households

across five boroughs and regional attendance areas (**Attachments 1.k and 1.l**). On October 31, 2025 FNS granted the Division's request to extend the waiver until December 8, 2025 to allow those affected by the disaster additional time to recover and make claims. (**Attachment 1.m**)

FNS also confirmed that Alaska's SNAP Quality Control (QC) Investment Plan had been approved, with a formal letter received October 23, 2025 (**Attachment 1.n**). Throughout October, Alaska maintained close coordination with FNS leadership regarding pending federal approvals, including the Non-Merit Staff Demonstration Project, while continuing to implement federal direction during the shutdown. FNS expressed appreciation for Alaska's proactive engagement and clear communication throughout this period of uncertainty.

The above is the information the Division has available as of October 31, 2025.

See Attachment 1: Federal Guidance and Correspondence – Updated October 2025.

- a. SNAP Lapse in Funding Memorandum (10.01.2025)
- b. SNAP Guidance Memo for State Agencies (10.10.2025)
- c. SNAP Guidance for November (10.24.2025)
- d. Self-Report Inadvertent Issuance of November Benefits (10.22.2025)
- e. SNAP Retail Rumor Clarification (10.23.2025)
- f. AK FY2026 SNAP State Plan Approval (09.30.2025)
- g. ABAWD Implementation Memorandum (OBBB) (10.03.2025)
- h. Alaska ABAWD and Reinstatement Waivers – Request for Guidance (10.15.2025)
- i. Alaska ABAWD Waiver Approval (10.23.2025)
- j. Western Alaska Disaster Coordination (10.16.2025)

- k. Timely Reporting Waiver Approval (10.17.2025)
- l. Timely Notification Waiver Follow-Up (10.17.2025)
- m. Approval Letter – AK FY23 New Investment Plan (October 23, 2025)
- n. SNAP AK Quality Control Investment Plan (10.23.2025)

III. Timely Processing of Applications

A. Workload and Timeliness

As of early October, the Division reported an increase in pending Supplemental Nutrition Assistance Program (SNAP) and Adult Public Assistance (APA) cases compared to the previous month. Average processing times remained consistent, but the overall volume of untimely cases rose slightly as the Division managed multiple competing demands.

This increase reflects a period of intensive staff training, technology maintenance, and modernization activity that temporarily reduced available work hours and limited overtime opportunities. The Division also adjusted interview practice transitioning from cold calling to scheduled interviews, to improve efficiency and ensure more consistent contact with clients. While this change required additional coordination and presented short-term scheduling challenges, it is now stabilizing and expected to support higher completion rates moving forward.

Despite these pressures, staff across all offices and the Virtual Contact Center continued to make steady progress on pending work. As training concludes and modernization projects advance, the Division anticipates an improvement in processing timeliness and continued progress toward meeting federal standards.

See Attachment 3: Dashboard with Detail – Updated October 9, 2025.

B. IT Modernization

The Division continues advancing modernization efforts that improve efficiency and data integrity while laying the groundwork for long-term eligibility system replacement. Several major technology initiatives reached key milestones in October, though required testing and scheduled maintenance produced intermittent system downtime that temporarily limited staff access and contributed to reduced case-processing capacity during the reporting period.

In early October, staff finished testing a new process in ILINX that will make it easier to manage renewal paperwork. The final step is connecting it to the ARIES eligibility system, which is expected later in the month before the new process is launched for staff use. The project will automate receipt and routing of renewal packets, reduce manual work and ensure accurate capture of receipt dates essential for federal timeliness tracking.

Work also advanced on the ILINX Long-Term Care module, with configuration completed and final testing of fax and email import features underway. Planning for the launch is underway and will move forward once testing confirms that documents can be transmitted securely. The Notice Renewal Interview (SMS) Process project was formally initiated on October 3 following Department approval of the project plan. This enhancement will enable the Division to send automated interview notices and reminders via text message, improving communication with clients and reducing missed appointments that delay case completion.

The All Services Application remains delayed pending required federal and internal approvals from the Food and Nutrition Service, and Centers for Medicare & Medicaid Services. Although system configuration and testing are complete; the solution cannot proceed to production until those reviews conclude. The Division continues to coordinate with federal partners to address comments and maintain readiness to implement once approvals are granted.

Collectively, these projects represent substantial progress toward replacing aging systems and introducing automation that will lessen the administrative burden on staff and reduce the risk of inadvertent human error. However, modernization work has required multiple scheduled outages and coordination with external vendors, occasionally affecting system performance and limiting staff ability to work overtime or complete case actions during maintenance windows. The Division continues to balance implementation demands with operational priorities to minimize disruptions while ensuring each release is stable, secure, and compliant with federal requirements.

See Attachment 4: Information Technology Modernization Project Roadmap – Updated October 2025.

C. Staffing Improvements

Staffing activity remained steady in September, with fewer personnel actions recorded compared to the previous reporting period. This reflects a month focused on maintaining workforce stability while preparing for upcoming recruitments.

The Division continues to prioritize recruitment for Eligibility Technician (ET) positions at the ET 1 and ET 2 levels, which remain essential to timely case processing and client service delivery. New positions for the Virtual Contact Center (VCC) are still

going through the State's approval process. The position numbers (PCNs) have been created, but the jobs aren't finalized or posted yet. Once the approval process is finished, the positions will be posted, and hiring can begin. Recruitment efforts continued across field and central offices, and the Division achieved a measurable improvement in its hiring process, reducing the average time from posting closure to filled position from more than 70 days to 53 days. This reduction supports faster onboarding and improves overall operational readiness.

Overall, staffing levels remain stable, and the Division continues to emphasize timely recruitment, internal advancement, and coordinated workforce planning to sustain progress in program delivery and timeliness performance.

See Attachment 5: Status of Eligibility Technician Positions – Updated October 3, 2025.

D. Non-Merit Contract Staff

As of September 30, 2025, contracted staff provided through Public Consulting Group (PCG) totaled 140, including one call center manager, one quality assurance manager and trainer, thirteen supervisors, and 121 active eligibility associates. These staff continue to provide critical administrative and client-service support, enabling Division employees to focus on eligibility determinations and direct service delivery.

During this period, PCG advanced key training and operational goals. The first cohort of Medicaid Eligibility Associates completed training and began working independently, while the second cohort entered its final week of training in early October. Collaboration between PCG and the Division's Alaska-based training team has been

instrumental in ensuring readiness and maintaining quality as new staff transition to production.

PCG staff continued steady progress on case review activities, processing over 10,000 client-reported changes and hundreds of related applications and renewals. Service levels in the Virtual Contact Center remained strong, with the average speed of answer holding below ten minutes.

Staffing levels and performance remain stable, and the Division continues to work closely with PCG on quality monitoring, system alignment, and phased preparation for the broader implementation of Alaska's approved Non-Merit Staff Demonstration Project.

See Attachment 6: Distribution and Status of Contracted Staff – Updated October 2025.

E. Training and Development

The Division continues to operate multiple training cohorts to expand staff expertise across all public assistance programs. The ten-week Modified Adjusted Gross Income (MAGI) and Supplemental Nutrition Assistance Program (SNAP) course Medicaid remains the foundation for new Eligibility Technicians, combining classroom instruction with supervised case practice to ensure readiness for independent work by the end of the training period.

In addition to ongoing MAGI/SNAP training for new hires, the Instructor team concluded a combined Temporary Assistance and General Assistance (TA/GA) cohort in early October. Graduates are now receiving two weeks of post-classroom support and case reviews to reinforce learning and strengthen accuracy in case processing. Another

cohort of Public Consulting Group (PCG) staff began training on October 13, focusing on MAGI eligibility.

As of October, of the 123 filled Eligibility Technician 2 positions in the field, 110 are trained in MAGI and SNAP, 77 are trained in Adult Public Assistance (APA) and Senior Benefits (SB), 63 are trained in TA and GA, 56 are trained in the Heating Assistance Program (HAP), and 8 are trained in Long-Term Care (LTC). These figures demonstrate continued progress in cross-training and reflect the Division's commitment to developing a flexible and capable workforce that can meet shifting program demands.

Beginning in October, the Division also implemented its *Focus on Quality* initiative to provide dedicated, instructor-led staff development time. Under this plan, Public Assistance offices adjust public hours on the second and third Tuesday of each month so staff can participate in structured training and quality improvement activities, while lobbies remain open for essential services and client assistance. This approach ensures that client access is not interrupted while staff receive the focused learning time necessary to improve service delivery, consistency, and accuracy.

The Focus on Quality initiative reinforces the Division's commitment to building a skilled, confident, and supported workforce. Sessions are interactive and standardized statewide, with leadership participation expected. By setting aside protected time for professional development, the Division is investing in higher quality services, stronger communication, and a more engaged workforce dedicated to serving Alaskans with excellence.

See Attachment 7: Training and Development Update – October 2025.

IV. Efforts to Streamline Administration of Programs

During this reporting period, the Division's continued progress on administrative streamlining was affected by the federal government shutdown. Meetings with the Food and Nutrition Service to finalize the terms and conditions for Alaska's Non-Merit Staff Demonstration Project are temporarily paused until normal operations resume. While this delay slowed implementation planning, the Division continued internal readiness activities, ensuring that training, oversight, and system integration work can resume promptly once federal operations restart.

Despite these disruptions, the Division received formal approval of Alaska's Quality Control Investment Plan, marking a major advancement in its strategy to strengthen accuracy, consistency, and timeliness in eligibility operations. Work continues to prepare for implementation once follow-up coordination with federal partners resumes.

The Division also played a central role in Alaska's emergency response to the West Coast Storm, which resulted from the remnants of Typhoon Halong in early October 2025. The storm caused severe coastal flooding, power outages, and evacuations across multiple western communities. Following the Governor's State Disaster Declaration and the subsequent Presidential Major Disaster Declaration, the Division activated its disaster response plan and coordinated closely with FEMA, the Food and Nutrition Service, and community partners to protect access to nutrition assistance.

The Food and Nutrition Service approved Alaska's waiver extending the reporting period for replacement of SNAP benefits from ten to thirty days in the affected regions,

allowing impacted households additional time to report food loss and request replacements up to the value of their monthly allotment. Division staff assisted evacuees in Anchorage by providing on-site application and EBT card services at the Egan Center and Alaska Airlines Center, while the Virtual Contact Center managed a dedicated queue to support callers statewide. The Fairbanks office provided remote case support for displaced clients in Bethel, and public information was updated online with instructions for requesting replacements.

The Division is also evaluating additional options to support affected households and ensure continued access to food benefits while communities recover. These discussions with federal partners remain ongoing and will be implemented as appropriate once reviewed and approved.

Operationally, the Division also adjusted interview practices to improve efficiency. Previously, staff conducted cold calls to reach applicants for interviews, which often resulted in lost time and incomplete contacts. The Division shifted to scheduling interviews and sending notices, allowing staff to focus on confirmed appointments. By assigning more staff to the Virtual Contact Center, the Division achieved nearly full interview completion rates.

This change required some initial adjustments as the Division worked to align interview scheduling with available resources. Staff across offices collaborated to quickly adapt and meet client needs. Scheduling processes have since been refined to support a more balanced workflow, and upcoming IT modernization efforts will introduce automated scheduling features to further improve efficiency and reliability. Upcoming IT modernization improvements will include automated scheduling features to prevent

overbooking and balance appointment distribution, ensuring more efficient and reliable service delivery.

See Attachment 2: Efforts to Streamline Administration of Programs – Updated October 2025.

V. Conclusion

This reporting period reflects continued resilience amid disruption. The federal government shutdown has paused funding, and November SNAP benefits have not been issued as of this report. The Division continues full administrative operation processing applications, conducting interviews, and maintaining systems, to ensure benefits can be distributed immediately once appropriations resume.

Despite these challenges, the Division advanced critical initiatives, including approval of Alaska's Quality Control Investment Plan and progress in training, modernization, and quality improvement. The Division also led a strong emergency response to the West Coast Storm, coordinating with partners to maintain access to food assistance for affected communities.

Operationally, the shift from cold calling to scheduled interviews improved efficiency, and processes have stabilized following initial overbooking challenges. Upcoming automation will further strengthen scheduling and workload balance.

Through these efforts, the Division remains focused on stability, accountability, and care, sustaining essential services and maintaining readiness to serve Alaskans the moment federal funding resumes.